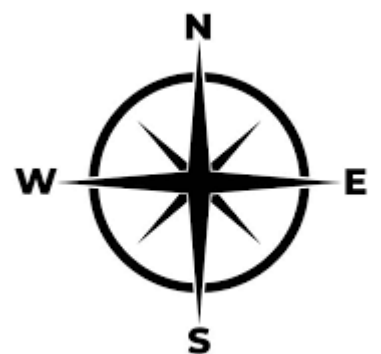


Guanajuato  
Mexican State



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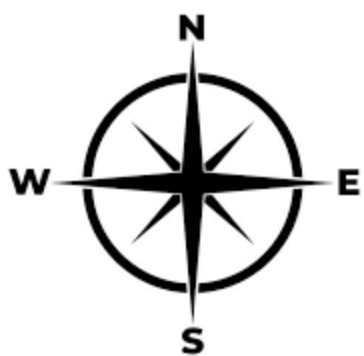


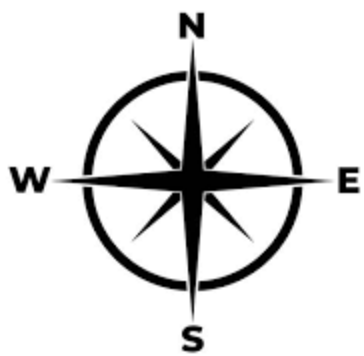


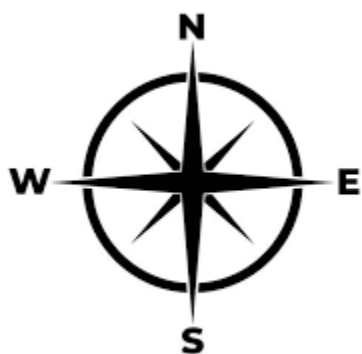


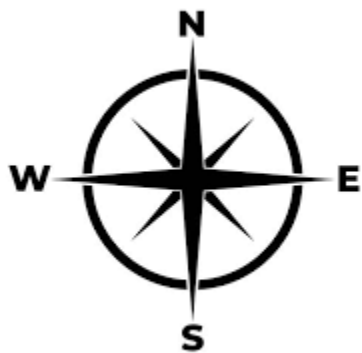
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# BCP Ingredients Plant



Compliance Evaluation Inspection  Direction: North	DESCRIPTION	Photo inside Building V-26 facing north from the mid-facility wall showing (from back to front) the kiln, hammer mill, and cooler for choline chloride production	Photo 001
	PHOTOGRAPHER	Jodi Harper	Date 06/07/2022



Compliance Evaluation Inspection  Direction: WSW	DESCRIPTION	Photo taken from mid-building door on east side of Building V25, facing west-southwest of the ethylene oxide repackaging warehouse (blurry)	Photo 002
	PHOTOGRAPHER	Jodi Harper	Date 06/07/2022



Compliance Evaluation Inspection  Direction: WSW	DESCRIPTION	Photo taken from mid-building door on east side of Building V25, facing west-southwest of the ethylene oxide repackaging warehouse	Photo 003
	PHOTOGRAPHER	Jodi Harper	Date 06/07/2022



Compliance Evaluation Inspection  Direction: WSW	DESCRIPTION	Photo taken from mid-building door on east side of Building V25, facing west-southwest of the ethylene oxide repackaging warehouse	Photo 004
	PHOTOGRAPHER	Jodi Harper	Date 06/07/2022





Compliance Evaluation Inspection  Direction: Northwest	DESCRIPTION	Photo looking northwest from end of ethylene oxide railcar at rail offloading station T9A, where April 8, 2022 release occurred.	Photo 005
	PHOTOGRAPHER	Jodi Harper	Date 06/07/2022



Compliance Evaluation Inspection  Direction: NNE	DESCRIPTION	Photo looking north-northeast from a point west of Tank T2, with a view of Tank T1. Tank T1 was in service at the time of the April 8, 2022, release, but at the time of inspection, was taken out of service.	Photo 006
	PHOTOGRAPHER	Jodi Harper	Date 06/07/2022



Compliance Evaluation Inspection	DESCRIPTION	Photo looking east-northeast from a point west of Tank T2 with a view of Tank T1. Tank T1 was in service at the time of the April 8, 2022 release, but has since been taken out of service.	Photo 007
	PHOTOGRAPHER	Jodi Harper	Date 06/07/2022



Compliance Evaluation Inspection	DESCRIPTION	Photo looking slightly north of west from underneath the covered area of the ball valve involved in the April 8, 2022 release.	Photo 008
	PHOTOGRAPHER	Jodi Harper	Date 06/07/2022





Compliance Evaluation Inspection	DESCRIPTION	Photo looking slightly west of north from under the covered area. Photo is of the ball valve involved in the April 8, 2022 release.	Photo 009
	PHOTOGRAPHER	Jodi Harper	Date 06/07/2022



Compliance Evaluation Inspection	DESCRIPTION	Photo looking slightly west of north from the base of the stairs to filling station T9, showing the video monitor for the railcar unloading process.	Photo 010
	PHOTOGRAPHER	Jodi Harper	Date 06/07/2022





Compliance Evaluation Inspection  Direction: East	DESCRIPTION	Photo looking east from a point south of the covered valve area, looking at Tank T2.	Photo 011
	PHOTOGRAPHER	Jodi Harper	Date 06/07/2022



Compliance Evaluation Inspection  Direction: East	DESCRIPTION	Photo looking east from a point about 10 feet closer to Tank T2 than in photo 011, above, of Tank T2.	Photo 012
	PHOTOGRAPHER	Jodi Harper	Date 06/07/2022



Compliance Evaluation Inspection	DESCRIPTION	Photo looking south from a point just north of the emergency shower, of the emergency shower at the railcar unloading station.	Photo 013
	PHOTOGRAPHER	Jodi Harper	Date 06/07/2022



Compliance Evaluation Inspection	DESCRIPTION	Photo looking west from a point east of the emergency shower, of the emergency shower at the railcar unloading station. Facility personnel demonstrated that the emergency shower was operational.	Photo 014
	PHOTOGRAPHER	Jodi Harper	Date 06/07/2022





Compliance Evaluation Inspection	DESCRIPTION	Photo looking southwest from a point along the rail spur at the temporary wastewater holding basin.	Photo 015
	PHOTOGRAPHER	Jodi Harper	Date 06/07/2022



Compliance Evaluation Inspection	DESCRIPTION	Photo looking east from west of the trimethylamine storage tank of storage tank.	Photo 016
	PHOTOGRAPHER	Jodi Harper	Date 06/07/2022





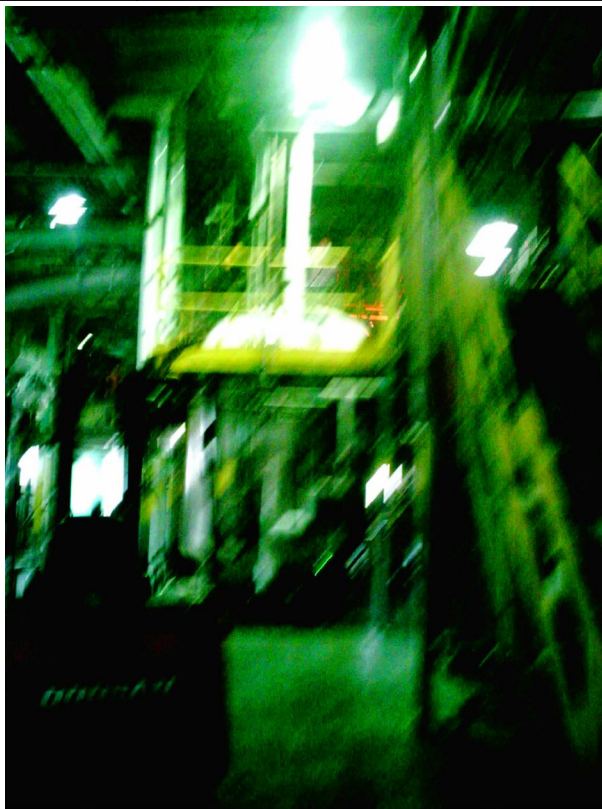
Compliance Evaluation Inspection	DESCRIPTION	Photo looking northeast from southwest end of the trimethylamine storage tank of the spyglass, showing the tank fill level.	Photo 017
	PHOTOGRAPHER	Jodi Harper	Date 06/07/2022



Compliance Evaluation Inspection	DESCRIPTION	Photo looking south from southwest end of trimethylamine storage tank of the reactor vessel where trimethylamine, hydrochloric acid, and ethylene oxide are reacted to form (?)	Photo 018
	PHOTOGRAPHER	Jodi Harper	Date 06/07/2022



Compliance Evaluation Inspection	DESCRIPTION	Photo looking southwest from intersection northeast of Building V25, showing exterior markings, safety systems, and piping for raw material delivery to the building.	Photo 019
	PHOTOGRAPHER	Jodi Harper	Date 06/07/2022



Compliance Evaluation Inspection	DESCRIPTION	Photo looking north from inside Building V10 at the choline chloride manufacturing equipment (blurry)	Photo 020
	PHOTOGRAPHER	Jodi Harper	Date 06/07/2022





Compliance Evaluation Inspection	DESCRIPTION	Photo looking north from inside Building V10 at the choline chloride manufacturing equipment.	Photo 021
	PHOTOGRAPHER	Jodi Harper	Date 06/07/2022



Compliance Evaluation Inspection	DESCRIPTION	Photo looking at ethylene oxide sensor reading of equipment in Photo 021, above. Handheld monitors worn by EPA inspectors had alarmed, with readings above 2.0 ppm; the above monitor read 0.0 ppm.	Photo 022
	PHOTOGRAPHER	Jodi Harper	Date 06/07/2022